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March 26, 2002

By Email & U.S. Mail

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
Commonwealth of Massachusetts
One South Station
Boston, MA 02110

Re: ***D.T.E. 01-34***

Dear Secretary Cottrell:

Pursuant to the March 19, 2002, electronic memorandum of Hearing Officer Evans in the above matter, I am writing with respect to the schedule proposed by Verizon in its March 19, 2002, letter.

First, with respect to the Department's inquiry as to witness availability, at this time WorldCom witness Karen K. Furbish is generally available on the dates proposed by Verizon. But second, and more important, the Department should not allow the hearings to be put off that far. Based on its conduct in this case, Verizon has shown that it believes the Department's investigation to be little more than a nuisance; there is no incentive for Verizon to cooperate and every incentive for Verizon to delay. And as detailed in the comments filed by AT&T earlier today, Verizon has already achieved extended delays in this matter with remarkable ease, and without any serious repercussions.

WorldCom does not have the ability to make Verizon take this case seriously. But the Department does. In that regard, WorldCom agrees with AT&T that the immediate imposition of reporting requirements on Verizon may prompt it to focus more of its resources on the issue of its special access performance in general, and on this case in particular. WorldCom also agrees that having two consecutive days of hearings on or near the dates proposed by the Department (with the option for further days of hearings, as needed) may be a viable, if less than satisfactory, alternative to having three days of hearings at the end of May.

WorldCom respectfully suggests that the Department and the parties explore the possibility of scheduling two days of hearings on or near the Department's proposed hearing dates

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before contemplating either Verizon's proposed dates or AT&T's second alternative of making Verizon's witnesses available individually.

Thank you for your attention to this matter.

Very truly yours,

Christopher J. McDonald

cc (*by email & fax*): Joan Foster Evans, Esq., Hearing Officer
cc (*by email & U.S. Mail*): Service List